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14 IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA)
17 Plaintiff,)
18 v.) Civil No. 07-4762-PJH
19 CHARLES CATHCART *et al.*) STIPULATED PROTECTIVE
20) ORDER COVERING PERSONAL
Defendant.) IDENTIFYING INFORMATION
21

22 Disclosure and discovery activity in this action is likely to involve production of a
23 significant number of documents containing confidential Personal Identifying Information,
24 defined here to include individual social security numbers, taxpayer-identification numbers, birth
25 dates, the names of minors, and financial-account numbers. The confidential nature of this
26 information warrants special protection from public disclosure, and the parties therefore stipulate
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1 to and ask the Court to enter this Stipulated Protective Order covering Personal Identifying
2 Information.

3 By stipulating to this Protective Order, the parties acknowledge that they will receive un-
4 redacted discovery containing Personal Identifying Information, and covenant to abide by the
5 guidelines for redacting Personal Identifying Information established by Rule 5.2 of the Federal
6 Rules of Civil Procedure in all electronic or paper filings with the Court.

7 Specifically, the parties agree to redact from any court filing all but the last four digits of
8 any social-security number or taxpayer identification number, all but the last four digits of any
9 financial-account number, all but the first and last initials of a minor child's name, and all but the
10 year of an individual's birth date.

11 The parties further stipulate that any Personal Identifying Information produced during
12 discovery is produced solely for purposes of prosecuting and/or defending this case only, and any
13 other use of Personal Identifying Information so produced is prohibited. The parties agree to
14 destroy material reflecting Personal Identifying Information produced by other parties at the
15 conclusion of this litigation.

16 This stipulation does not preclude use of Personal Identifying Information that is
17 consistent with the exceptions to redaction listed in Fed. R. Civ. P. 5.2(b) or an order of the Court.
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19 IT IS SO STIPULATED.

20 Dated: April 29, 2008

/s/ Allyson B. Baker

Allyson B. Baker, Attorney for Plaintiff

21 Dated: April 21, 2008

/s/ Eric Webb

Eric Webb, Attorney for Charles Cathcart

23 Dated: April 22, 2008

/s/ David Porter

David Porter, Attorney for Scott Cathcart

24 Dated: April 28, 2008

/s/ Farley Neuman

Farley Neuman, Attorney for Robert Nagy

26 Dated: April 28, 2008

/s/ Yuri Debevc

Yuri Debevc, pro se

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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3 DATED: _____

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UNITED STATES DISTRICT JUDGE